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June 17, 2022

BY ECF

Honorable Paul G. Gardephe United States District Judge Southern District of New York 40 Foley Square New York, NY 10007 **MEMO ENDORSED**

The Application is granted.

SO ORDERED:

Paul G. Gardephe, U.S.D.J.

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Re: United States v. Anthony Rose, 19 Cr. 789 (PGG) Dated: June 23, 2022

Dear Judge Gardephe:

I write to respectfully request that the Court modify Anthony Rose's travel restrictions to allow his attendance at several business-related trainings and conferences over the next six months. Since his release on bail in this case, Mr. Rose has traveled numerous times in connection with his work, always without incident. See, e.g., ECF No. 200, 213, 289, 337, 401, 556, 667.

Mr. Rose now requests the Court's permission to travel for work-related trainings and conferences on the following dates:

- 7/2/22 7/5/22: New Orleans, LA
- 7/14/22 7/18/22: Los Angeles, CA
- 7/29/22 8/1/22: Atlanta, GA and Charlotte, NC
- 8/12/22 8/15/22: Hilton Head, SC and Charlotte, NC
- 8/26/22 8/29/22: Miami, FL
- 9/16/22 9/19/22: Houston, TX
- 9/23/22 9/26/22: Raleigh and Charlotte, NC
- 10/14/22 10/17/22: Orlando, FL
- 10/21/22 10/24/22: Knoxville, TN and Charlotte, NC
- 11/4/22 11/7/22: Columbia, SC and Charlotte, NC
- 11/18/22 11/21/22: Washington, DC and Charlotte, NC
- 12/2/22 12/5/22: Charlotte, NC
- 12/16/22 12/19/22: Dallas, TX

Pretrial Services and the Government take no position on this request. Thank you for considering it.

Respectfully submitted,

<u>/s/ Ariel Werner</u>
Ariel Werner, Esq.
Assistant Federal Defender
(212) 417-8770

cc: Mathew Andrews, Assistant U.S. Attorney Louis Pellegrino, Assistant U.S. Attorney Shannon Finneran, U.S. Pretrial Officer